

2. The defendant was charged in a complaint dated November 12, 2019 with violations of Title 18, United States Code, Sections 1341, 1028A, 1512(c), and 1623 (mail fraud, aggravated identity theft, obstruction of justice, and false declarations before a court). The defendant was arrested in the Southern District of Florida on November 19, 2019, presented that day before Magistrate Judge Patrick M. Hunt of the United States District Court for the Southern District of Florida, and released on a \$150,000 personal recognizance bond, among other bail conditions. On December 3, 2019, the defendant was presented before Magistrate Judge Barbara Moses. The

defendant was represented by Brian Griffin, Esq. at this proceeding and ordered released on \$150,000 personal recognizance bond, in addition to other bail conditions.

3. At the presentment on December 3, 2019, defense counsel consented to a waiver of his client's right, pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure, to a preliminary hearing within 21 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until January 2, 2020 within which to file an indictment or information. On January 2, 2020, Magistrate Judge Stewart D. Aaron entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until February 3, 2020. On February 4, 2020, Magistrate Judge Sarah Netburn entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until March 4, 2020.


4. Defense counsel and I have had discussions regarding a possible disposition of this case. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on March 4, 2020.

5. Therefore, the Government is requesting a 30-day continuance, until April 3, 2020, to continue the foregoing discussions and reach a disposition of this matter. On March 2, 2020, I personally spoke to defense counsel who specifically consented to this request.

6. This application has been authorized by Assistant United States Attorney Andrew Dember, Deputy Chief of the Criminal Division.

7. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
March 3, 2020



Rushmi Bhaskaran  
Assistant United States Attorney  
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